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July 29, 2019

Honorable Peggy Kuo, Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: **Razzano v. Remsenburg-Speonk Union Free Sch. Dist., et al.**
Case No. 11-CV-02920-KAM-PK

Dear Judge Kuo:

The parties in this action jointly write to the Court pursuant to the Status Report Order issued on July 22, 2019. A new attorney has been assigned by the firm represent the defendants and he is still in the process of reviewing the extensive case file. In the meantime, counsels for the plaintiff is still in the process of obtaining a complete case file from his client and her former attorney.

Fact discovery is closed with the exception updating the defendants on Plaintiff's mitigation of damages. The defendants' preliminary assessment of the case is that a dispositive motion premised on either *res judicata* or *collateral estoppel*, or otherwise upon uncontested facts that have been established, will dispose of most if not all of the plaintiff's claims. The plaintiff disputes this assessment.

With all of the above in mind, the plaintiff has no objection to defendants' motion for an enlargement of time, up to and including September 12, 2019 in which to file the above-mentioned dispositive motion. The plaintiff's response would be due within thirty (30) days. A reply -if any- would be due ten (10) days from the plaintiff's response.

As to a possible settlement conference, the plaintiff believes that such would be fruitful. The defendants dispute any liability and presently have a no pay position. However, following a productive telephone discussion among counsel, defense counsel will be making inquiry as to whether there is the potential for a settlement in this matter. Should the Court set a settlement conference, counsels for the plaintiff and the defendants' calendars are flexible for anytime next month (August 2019) for a date at the Court's convenience.

July 29, 2019

Thank you for your attention to the above.

Respectfully submitted,

MASON LAW, PLLC

/s/ D. Christopher Mason

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